

Solvent Metal Wipe Cleaning RACT

SBCA-SOR1-0800

The purpose of this summary is to help you understand how a new RACT (Reasonably Available Control Technology) rule for Solvent Metal Wipe Cleaning may affect your business. This regulation was created as a result of the Clean Air Act Amendments of 1990, mandating states with ozone problems to reduce volatile organic compound (VOC) emissions, which are a primary cause of ozone. The location of your business, the size of your operation, and the types of chemicals you use will determine how this law affects you. The actual regulation can be found in section NR 423.03 of the Wisconsin Administrative Code.

Does This Regulation Affect My Business?

This rule applies to businesses located in the ozone nonattainment area which includes the counties of Kenosha, Kewaunee, Manitowoc, Milwaukee, Ozaukee, Racine, Sheboygan, Washington and Waukesha, using solvent to manually wipe soils from the metal surfaces of products or product components.

This rule does not apply to general facility maintenance or equipment clean up such as for printing presses or spray guns.

Are There Any Exemptions to this Regulation?

The following exemptions apply to individual wipe cleaning operations:



❶ Individual wipe-cleaning operations that emit no more than 15 pounds (6.8 kg) of VOCs in any one day are exempt from the pollution control device requirements.

❷ Individual wipe cleaning operations using only cleaning solvents having a

VOC content of 2.0% or less are exempt from all requirements of this rule. (Except record keeping of VOC content %.)

Exempt facilities located in the non-attainment area must maintain adequate records to support their exemption.

How Does My Business Comply With This Regulation?

There are three areas in which affected businesses must comply. An explanation of each type of compliance requirement is included in this summary. Affected businesses should be in compliance with this rule by now. The three areas include:

- 1. Operating Requirements**
- 2. Control Device Requirements**
- 3. Record Keeping**

1. Operating Requirements

- ❖ Do not allow solvent to drip from the applicator during application;
- ❖ Provide a label stating operating requirements. Provide supervision or instruction to ensure that the operation is conducted appropriately;

❖ Immediately after use Store all solvent-laden rags in a covered container that is labeled as waste solvent; and,

❖ Store waste solvent in covered containers labeled as waste solvent.

2. Control Device Requirements

Use either:

❶ A carbon adsorption system demonstrated to have at least a 90% capture efficiency and a 90% control efficiency, measured across the carbon adsorption equipment and averaged over a complete adsorption cycle; or,

❷ A solvent with a volatility less than 0.3 psia at 100° F; or,

❸ Another equivalent system approved by the Department of Natural Resources (DNR).

3. Record Keeping

Businesses located in the non-attainment area that are exempt from this regulation, or part of this regulation, must maintain the necessary records proving they qualify for an exemption. Keep the following information on hand for at least three years.

- ✓ A unique name or identification number for each wipe-cleaning operation;
- ✓ The volume of solvent used or added per day in each individual degreaser or wipe cleaning operation in units of gallons;
- ✓ The VOC emission per day from each individual degreaser or wipe cleaning operation, in units of pounds;
- ✓ The density of the solvent used, in units or pounds per gallon; and,
- ✓ The VOC content of the solvent, expressed as percent of VOC by volume of solvent.

Information on the VOC content and density of the solvents used can be obtained from their

Material Safety Data Sheets (MSDS) or suppliers.

Pollution Prevention

There is a common misconception that waste reduction efforts are costly and provide little economic value to a business. In reality, such efforts can increase competitiveness, simplify compliance with environmental regulations, decrease waste disposal costs, decrease liability, and improve worker health and safety.

The requirements of the Solvent Metal Wipe Cleaning RACT help reduce the amount of pollution generated by industry. While a single facility may not be a major cause of pollution, when taken together, all the facilities involved in wipe cleaning represent a significant source of emissions. With the use of more efficient equipment and operating procedures, emissions of volatile organics will be minimized, while reducing costs for the business and increasing bottom line profits.

Additional efforts to reduce waste and increase profits could include:



- ❖ Training your operators on efficient application techniques. This will maximize the performance of your operators and your equipment.
- ❖ Keeping solvents and other VOC containing materials in closed containers. This will reduce evaporation and protect the health and safety of your workers.
- ❖ Controlling your inventory and rotating your stock. Some solvents may have a limited shelf life. Check with your supplier for expiration dates.
- ❖ Considering a free and confidential assessment of your operations. Contact the Solid & Hazardous Waste Education Center (SHWEC) in Milwaukee at 414/227-3165.



Contacts for More Information or Assistance.

The Small Business Clean Air Assistance Program helps smaller businesses understand and comply with the Clean Air Act regulations. Contact one of the program's Clean Air Specialists for more assistance: Renée Lesjak Bashel at 608/264-6153 or Tom Coogan at 608/267-9214.

For further information on the solvent cleaning RACT rule contact your DNR Regional or Service Center office shown on the **DNR Contact Fact Sheet** or the DNR's Central office at 608/266-2856.

For more information about waste reduction opportunities, you can contact the Pollution Prevention Information Clearinghouse at 608/267-3763. The Cooperative Environmental Assistance Program at DNR has case studies on pollution prevention achievements on their website under Publications.